REMARKS

Claims 1-21 are pending in the application.

Claims 1-11 are allowed.

Claims 12-18 are rejected.

Claims 12-18 are rejected under 35 U.S.C. 102(e).

Claim 12 is currently amended.

Claims 19-21 are new.

No new matter is added.

Claims 1-21 remain in the case for consideration.

Applicant requests reconsideration and allowance of the claims in light of the above amendments and following remarks.

Claim rejections - 35 USC § 102

Claims 12-18 are rejected under 35 U.S.C. 102(e) as being anticipated by Nam, et al. (US 6,742,561), hereinafter "Nam".

Applicants respectfully traverse the rejections.

Claim 12 as acted on by the Examiner recites a tape attaching device for attaching the insulating adhesive tape to an area between the electrode pads of the first chip.

Nam fails to show or suggest the above limitation of claim 12. In FIG. 4, Nam shows adhesive tape 48 attachable to die pad 66 by the tape pick-up tool 52. The adhesive tape 48 is only shown to be attachable to the die pad area that is to the side of a first semiconductor chip 64, not to an area between the electrode pads of the first chip. Furthermore, Nam does not suggest any sort of placement precision that would be necessary to attach adhesive tape 48 to this area. As a result, apparatus 40 is not capable of performing according to claim 1. Therefore, it is submitted that claim 12 as acted on by the Examiner in the last Office Action is patentably distinguishable over the prior art.

Even so, claim 12 is currently amended to further distinguish the invention from the cited art. Specifically, claim 12 now recites a tape attaching device for attaching one side of the insulating adhesive tape to the first chip while a second chip is attached to the other side of the insulating adhesive tape by a chip attaching device. Nam does not show or teach this. Rather, in Nam, second chip 72 is attached next to, and separate from, first semiconductor chip 64, as shown in Nam's FIG. 4.

For at least the reasons described above, the applicants request allowance for this claim as amended.

Claims 13-18 depend upon claim 12 and inherently include all of the limitations of the base claim. As discussed above, the prior art does not teach the limitations of the base claim much less the further embodiments of the dependent claims. Therefore, claims 13-18 are allowable for their dependency and their own merits. Allowance of these claims is requested.

New Claims

Claim 19 is new. Support for this claim can be found on page 9, lines 21-22, and in FIG. 2, showing the tape attaching device 59 with a rotating degree of freedom. No new matter has been added. The cited reference Nam does not show or suggest a tape attaching device that is rotatable through an angle of 90 degrees to place the insulating adhesive tape onto the first chip with a variable orientation. Allowance of this claim is requested.

Claims 20 and 21 are new. Support for these claims can be found on page 8, lines 23-26 and FIG. 2, which shows cover films 21 and 23 being removed by reels 42 and 43, respectively. The cited reference Nam does not show or suggest a cover film on the adhesive tape, let alone reels for removing such a cover film. Allowance of these claims is requested.

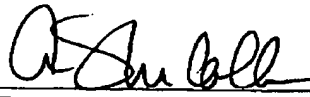### *Allowable Subject Matter*

Claims 1-11 are allowed.

Applicant thanks the Examiner for indicating that claims 1-11 are allowed, as in the Office Action mailed 7/12/2005.

Conclusion

For the foregoing reasons, reconsideration and allowance of claims 1-21 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.
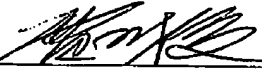
Respectfully submitted,

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> I hereby certify that this correspondence is being transmitted to the U.S. Patent and Trademark Office via facsimile number (571) 273-8300 on October 7, 2005.
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